

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

**ZACK ELLIS, GERONIMO PEREZ,  
ARTURO SALINAS, JARROD M. DANIEL,  
and KERRY TAWATER, individuals,**

**Plaintiffs,**

**vs.**

**TRI-STATE OIL FIELD SERVICES, Inc.,  
a Texas Corporation, RICARDO “RICKY”  
CANTU, an individual, RICKY’S  
TOWING OF AMARILLO, LLC,  
a Texas limited liability company, KATRINA  
KINCAID, an individual, and CANTU  
TOWING, LLC, a Texas limited liability  
company,**

**Defendants.**

**CASE NO. 2:15-CV-00058-J**

**JURY TRIAL DEMANDED**

**PLAINTIFFS’ WRITTEN DESIGNATION OF EXPERTS**

NOW COME, Zach Ellis, Geronimo Perez, Arturo Salinas, Jarrod M. Daniel and Kerry Tawater, plaintiffs and file this their list of potential experts as follows:

Plaintiffs intend to call the following experts in this case:

1. LAW OFFICES OF JERRY D. McLAUGHLIN  
Jerry D. McLaughlin, SBN 13743300  
2700 S. Western St., Suite 1000  
Amarillo, Texas 79109  
806-371-9110 - Telephone  
806-373-9029 - Facsimile

Subject of Information: As to attorney fees

2. LAW OFFICES OF PHILIP R. RUSS  
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Subject of Information: As to attorney fees

Plaintiffs respectfully request permission to cross-designate, or utilize, to the fullest extent allowed by the Federal Rules, any and all other experts designated by any other party to this lawsuit.

Plaintiffs respectfully request permission to reserve the right to supplement their designation in the event the Court grants their Motion for Notice and Mail-Out which is pending before the Court and is ripe for a ruling.

Respectfully submitted,

LAW OFFICES OF JERRY D. McLAUGHLIN  
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- and -

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BY: /s/ Philip R. Russ  
Philip R. Russ, SBN 17406000  
*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 26<sup>th</sup> day of May, 2015, I electronically filed the foregoing document with the Clerk of the Court for the Northern District of Texas, by using the CM/ECF system which will send a notice of electronic filing to the following CM/ECF participant:

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By: /s/ Philip R. Russ  
Philip R. Russ